

November 30, 1998

PUBLIC UTILITIES COMMISSION  
Metering, Billing, Collections, and  
Enrollment Interactions among Transmission  
and Distribution Utilities and Competitive  
Electricity Providers (Chapter 322)

NOTICE OF RULEMAKING

WELCH, Chairman; NUGENT, DIAMOND Commissioners

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## **I. INTRODUCTION**

This Rule establishes terms and standards governing metering, billing and collections by transmission and distribution utilities and by competitive electricity providers operating in Maine. The Rule also establishes terms and standards governing customer enrollment for generation service, transfer from one generation service provider to another, and termination of generation service. Finally, the Rule establishes terms governing the transfer of customer information among transmission and distribution utilities (utilities) and competitive electricity providers (providers).

## **II. BACKGROUND**

During its 1997 session, the Legislature fundamentally altered the electric utility industry in Maine by deregulating electric generation services and allowing for retail competition beginning on March 1, 2000.<sup>1</sup> At that time, Maine's electricity consumers will be able to choose a generation provider from a competitive market. As part of the restructuring process, the Act requires utilities to divest their generation assets and prohibits their participation (except through unregulated affiliates) in the generation services market.

The Act requires that the provision of electric billing and metering be subject to competition on or before March 1, 2002. A proceeding is currently under way (Docket No. 98-688, Inquiry into the Provision of Competitive Meter and Billing Services) to seek comments on the timing and implementation of competitive electric billing and metering. Until competitive billing and metering is implemented, terms must be developed to govern billing, metering, and collections for distribution service and for generation service. The implementation of restructuring also requires the determination of terms governing the processes by

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<sup>1</sup> An Act to Restructure the State's Electric Industry (the Act), P.L. 1997, ch. #316 codified as 35-A M.R.S.A. §§ 3201-3217.

which customers initiate and change their enrollment with competitive electricity providers.

Finally, significant quantities of data must be transferred between utilities and providers to facilitate business activities. Providers' operational and marketing needs will increase the frequency and quantity of customer-specific data that utilities will be asked to transfer. Terms must be set to ensure that the needs of all participants are met at a reasonable cost and that costs are allocated equitably.

### **III. THE INQUIRY PROCEEDING**

Prior to developing the proposed Rule, we conducted an Inquiry in Docket No. 98-482. We solicited written comments by issuing a Notice of Inquiry on July 6, 1998. We received written comments from Bangor Hydro-Electric Company (BHE), CellNet, Central Maine Power Company (CMP), Dirigo Electric Cooperative, the Edison Electric Institute, EnergyEXPRESS, ENRON, ITRON, MainePower, Maine Public Service Company (MPS), and the Office of the Public Advocate. Comments filed in response to the Inquiry were helpful in developing the proposed Rule. The Electronic Business Transfer (EBT) Standards Working Group, which was initiated in Docket No. 98-522 (Investigation into Electronic Business Transaction Standards for the Exchange of Information in a Restructured Electricity Industry), also provided information useful in developing the proposed Rule. Participants in the EBT Working Group include BHE, CMP, Energy Atlantic, Kennebunk Light and Power, MainePower, and MPS.

### **IV. DISCUSSION OF INDIVIDUAL SECTIONS**

#### **A. General Principles**

In developing all rules for retail competition, we attempt to maintain consistency with operations throughout the region in order to prevent confusion, to minimize the effort required by market participants, and to avoid unnecessary costs. In this way, we seek to create a market environment that facilitates participation by sellers of retail electricity by minimizing the cost and complexity that providers will encounter in implementing the rules.

In addition, we consider factors that are uniquely relevant to the proposed Rule. A portion of this Rule addresses billing, metering and collections. The terms for these processes must balance two concerns. On the one hand, the ability of competitive electricity providers to offer their own pricing packages (and associated metering technology) is important to attracting retail providers to Maine and to delivering to consumers the cost-cutting advantages of retail competition. On

the other hand, introducing new pricing structures, metering, and billing procedures is complex and costly. For example, existing computer billing systems are often difficult to alter, and new systems are expensive to install in the short term.

We have balanced the need for flexible retail offerings with their expense by requiring utilities to provide a basic level of services for providers at no charge to the provider. We then allow providers to contract with utilities for additional services, but we do not require utilities to provide them. We allow utilities to charge for additional services and negotiate their terms through contract. If a utility cannot or will not deliver a desired service, the provider or the market may develop it.

We invite comment on whether utilities should provide the basic level of services described in the Rule at no charge, or whether charges based on cost or other criteria should be imposed on all providers. We invite comment on how such charges would be determined for standard offer providers and for other competitive electricity providers.

Another factor that we considered when developing the proposed Rule is that billing, metering and collections form the heart of a business's infrastructure. Put simply, these operations must work for the business to survive. The procedures are far more complex than is immediately obvious; they impact financial health, consumer protection, and safety. By limiting basic level services to those that are not excessively complex, the proposed Rule introduces changes to these systems at a pace and complexity level that can be successfully accommodated by all participants.

B. Section 1: Definitions

Section 1 defines terms used in this Rule. When definitions are provided by the Act, these definitions have been incorporated into the Rule.

C. Section 2: Applicability

This section clarifies that unless otherwise stated, provisions of the proposed Rule are not applicable to aggregators, brokers and standard offer providers. We invite parties to consider carefully the definitions of aggregators, brokers, marketers, and competitive electricity providers and their treatment in the proposed Rule.

Section 2.B provides utilities and providers the flexibility to engage in more flexible procedures than those provided in the proposed Rule, without requiring it. The

provision requires that the terms for carrying out alternate procedures be included in contracts. We invite comment on the extent to which utilities should be required to comply with requests for nonstandard service.

D. Section 3: Bill Issuance for Generation Service and for Transmission and Distribution Service

Section 3 specifies the entities that may calculate and issue bills. Bills for delivery service and bills for generation service are addressed separately.

Most businesses believe it is essential to issue their own bills. The bill is a business's primary means of interacting with its customers; it allows a business to provide information and to establish an identity. We believe that both utilities and providers should be permitted to bill their own customers for their own service. The proposed rule permits the issuance of a combined delivery and generation bill only pursuant to agreement by both utility and provider.

We also considered the transitional nature of the retail electricity market. Customers will be learning for the first time that they are purchasing two products. The Rule's provisions are intended to facilitate this learning process during the early days of retail competition. For example, the proposed Rule does not allow competitive electricity providers to bill for delivery. The proposed Rule allows utilities to bill for generation service if a provider so desires, because we believe that many new providers will find it prohibitively expensive to provide billing services immediately; however, it requires the delivery and generation portions of the bill to be separately displayed -- though on a single piece of paper if the utility so chooses. It is likely that, as customers understand their purchase decisions better, they will benefit from rebundled energy products. Such combined billing will be considered after retail markets develop.

Commenters' opinions on this issue varied widely. Some competitive electricity providers sought the right to deliver a combined delivery and generation bill. A combined bill would offer "one-stop shopping" for their customers. The proposed Rule does not allow this option because we believe utilities should retain their right to communicate through the bill. More importantly, we believe the issues that must be worked out before allowing providers to bill for utility service are extremely complex and should be considered in the rulemaking on competitive metering and billing.

The billing provisions of the proposed Rule do not preclude a provider from maintaining an agency relationship with its customers in regard to issuing bills. Customers now may direct the utility to send their bill to a third party, who arranges payment. Under this arrangement, the customer is legally responsible for its payment obligations and nonpayment penalties. This third-party arrangement could continue unchanged, thereby permitting a provider to receive and pay its customer's transmission and distribution bill and, in turn, bill its customer for bundled utility and generation service. We invite comment on whether such an arrangement should be permitted and, if so, whether additional provisions should be implemented to protect consumers when providers default on payment or neglect to pass utility information to its customer. For example, should additional provisions permit or require providers to assume the legal responsibility for payment and for nonpayment penalties?

Section 3.A states that transmission and distribution utilities shall calculate and issue their bills.

Section 3.B states that competitive electricity providers may calculate and issue their bills, or they may choose to allow the utility to perform that function. Because we believe that many providers will find it prohibitively expensive to perform billing immediately, the proposed Rule requires that utilities perform this function upon request by a provider. This basic service might be one for which providers should compensate utilities. We invite comment on this issue.

Section 3.C cross-references two of the Commission rules that address generation service bills. We cross-reference other Commission rule provisions throughout the proposed Rule for clarity and completeness.

Section 3.D requires a utility, as a general practice, to use the same format for all generation service bills issued by the utility for competitive electricity providers. This consistency will allow consumers to easily understand their bill for generation service, and the requirement is consistent with the intent of provisions governing generation bill content in Chapter 305. In addition, requiring identical bill formats minimizes production costs.

Section 3.D allows a provider to request a customized bill. Utilities are not required to accommodate a request for nonstandard bill format but are free to develop terms with the requesting provider through contract. We have allowed utilities latitude in compliance to avoid an unworkable situation in which utilities are unable to respond to a request without unreasonably disrupting their operations. Should a provider find that the utility does not respond to a request for nonstandard bill format, the provider may create its own generation service bill.

We invite comments on whether this provision should offer a greater or lesser guarantee of utility compliance with provider requests.

If a provider issues its own bill, it may offer any bill format it desires. The bill content provisions of Chapter 305 will retain sufficient comparability to allow smaller consumers to understand and compare generation service bills.

Section 3.E describes how a utility will treat generation service billing after a customer has changed providers. The utility shall carry the provider's receivables for two billing periods - the final bill and collection period and one past-due bill and collection period. After that time, the provider will be responsible for collection of its past-due receivables. In general, these two billing periods will extend for approximately 60 days.

E. Section 4: Bill Calculation for Generation Service and for Transmission and Distribution Service

Section 4.A describes the price structures that transmission and distribution utilities must offer on behalf of competitive electricity providers.

Earlier in this Notice, we discussed the balance we seek between allowing providers to offer their own pricing packages and avoiding the cost of developing computer solutions for such flexibility. Commenters in the Inquiry recognized the difficulty of achieving this balance, acknowledging that utilities cannot reasonably accommodate all potential price structures that a provider might desire.

Section 4.A provides that, if the utility issues the generation service bill, generation service rate structures shall be identical to or less complex than the utility rate structure as a general practice. This provision will minimize production costs because some alternate price structures would be unduly costly, if not impossible, for a utility to accommodate.<sup>2</sup> As is the case with all basic services required by the proposed Rule, alternate arrangements are permitted under contract between the utility and a provider.

As with alternate bill formats, the proposed Rule allows a provider to request a nonstandard price structure. Utilities are not required to comply with a request for nonstandard price structure but are free to develop terms with the requesting provider through contract. For the same reason stated in our earlier discussion, we allow utilities latitude in

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<sup>2</sup> Examples include real-time pricing and time-of-day periods that conflict with those of the utility.

compliance to avoid an unworkable situation in which utilities are unable to respond without unreasonably disrupting their operations. Should a utility fail to respond to a competitive electricity provider's request, the provider has the option to perform its own billing. As with alternate bill formats, if a provider issues its own bill, it may offer any price structure it desires. We are concerned that the level of resources required to bill nonstandard price structures will severely limit utilities' ability to comply with all requests. This concern raises the question of prioritizing and of affiliate advantage. We seek comment on whether this provision of the proposed Rule offers excessive advantage to any providers and, if so, what solutions might be implemented.

Section 4.B contains rate change procedures that utilities must offer on behalf of providers. There is an administrative cost to changing prices mid-cycle, and a mid-cycle price change does not appear to be important to suppliers. Therefore, the proposed Rule requires provider rate changes to occur at the time of cycle meter reads unless more flexible procedures are developed through contract.

Section 4.C outlines the terms by which utilities will adjust bills and settlement load estimates. In general, these terms are covered in other Commission Rules or in ISO-NE procedures, which are cross-referenced in the proposed Rule.

F. Section 5: Metering for Generation Service and for Transmission and Distribution Service

Section 5 specifies the meters that competitive electricity providers may use for billing and other purposes.

Meter equipment and installation raise issues that do not occur when considering bills and price structures. The first issue is safety. To maintain adequate public safety, meters must be installed by trained individuals. If only utility employees may install meters, a second issue arises, namely that providers will be dependent upon utilities for this service. Therefore, utilities should be given less latitude to comply slowly or to refuse to comply with provider requests.

Section 5.A.1 states that utilities are solely responsible for installing meters for billing purposes. The meter equipment shall be determined by the utility's rate structure or other needs as a general practice. This requirement ensures compliance with safety standards, a cohesive physical infrastructure and minimal production costs. Most commenters in the Inquiry stated that meter standards are vital to all market participants for safety and system integrity. Commenters urged that careful development of standards, certification and oversight occur before allowing responsibility to extend beyond

the utility. We agree and believe that developing this process should be addressed in the rulemaking on competitive billing and metering.

Section 5.A.2 provides for alternate meters at provider request. The utilities' obligations for alternate meter provision are more extensive and less flexible than those in Section 3 and Section 4 because providers are not allowed to install meters themselves. Providers may request alternate meters but must pay the incremental cost of the meter and all associated operations. However, Section 5.A.2.b specifies that utilities must comply with such requests as quickly as practicable and sets general guidelines for prioritizing requests. Commenters indicated that utilities could likely comply with meter requests because incremental work was labor-intensive and they could hire the necessary personnel.

Commenters also believed that smaller customers must have the opportunity to benefit from retail competition, so the prioritizing guidelines seek to promote equity among customer groups. We invite comments on the workability of the prioritizing approach.

Section 5.A.2.c allows providers to install meters that are not used for billing. We invite comments on whether this section raises any concerns about safety or consistency.

Section 5.B charges utilities with the responsibility for safety compliance, installation and maintenance of meters used for billing purposes.

Section 5.C allows flexibility for meter ownership. A provider may request that it own a customer's meter. Consistent with bill format and price structure provisions, utilities may accommodate such requests but are not required to do so. The terms of accommodation are determined through contract.

Section 5.D allows utilities to recover stranded meter costs through their rates rather than from market participants. Commenters generally did not believe that stranded meter costs would be significant.

Section 5.E contains provisions for meter reading for billing purposes. It requires that only the utility may read the meter to determine the delivery and generation bills. We decided against allowing the provider to read the meter to create its own bill. First, the confusion that might be experienced by a customer who receives two different monthly usage levels is not offset by any clear benefit. Furthermore, the cost of meter reading is less in most cases when done by one entity. Section 5.E allows a provider to read its customers' meters at any time for purposes other than creating the generation bill.

G. Section 6: Collections and Payments

Section 6 contains the terms that the utility must follow to collect customers' delivery and generation service payments. It also addresses the allocation of partial bill payments.

Section 6.A states that when the utility bills for only delivery service, each entity collects payments of its own bills and manages its own arrearages.

Section 6.B states that when the utility bills for generation service, the utility must transfer to the provider the portion of collected funds that is owed the provider, within 5 business days of receiving payment from each customer. The time frame is short enough so that providers receive payment relatively soon and long enough to ensure that utilities' operations can comply. In addition, it allows a utility to group a few days' funds into less frequent payments, thereby reducing transfer costs. We invite comment on this time frame. The proposed Rule allows the utility and provider to agree upon the method of transfer.

Section 6.C provides for the allocation of funds when customers do not pay the full combined delivery/generation bill issued by the utility. Because a customer experiences higher risk upon nonpayment of the utility bill<sup>3</sup> than upon nonpayment of the generation bill, it may be argued that the customer is better protected if partial payments are allocated to the utility to the greatest extent possible. This approach also protects other ratepayers from the expense associated with nonpayment of delivery bills. On the other hand, a provider might cancel service quickly upon nonpayment, whereas utility rules allow flexibility for customers to pay arrearages. The operational process of managing arrearages to more than one entity is complex regardless of the method we adopt.

The proposed Rule specifies that, when the utility bills for both utility and provider service, a partial payment be first allocated to the utility bill, including all arrearages. If the partial payment fully covers this amount, the partial payment shall next be allocated to the current competitive electricity provider, including all arrearages. In this instance, the utility shall maintain record of all arrearages of the customer's current provider. Finally, the remainder of the

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<sup>3</sup> A customer can be disconnected from delivery service for nonpayment of the delivery bill. If a customer does not pay the generation bill, the provider might cancel service, but the customer would continue to receive generation service through the standard offer.

partial payment shall be allocated to the most recent prior competitive electricity provider, including as much of its arrearages as is recorded by the utility.

We invite comment on this or other allocation methods if those comments have not been submitted during the Inquiry. We invite comments on how best to allocate arrearages when the utility or provider offers services that are not directly needed for delivery or for generation. Finally, we invite comment on whether customers should be allowed to specify how much of each payment is allocated to the utility or the provider.

#### H. Section 7: Enrollment for Generation Service

Section 7 describes the process that utilities and providers must follow to initiate, change, or cancel generation service. Provisions in Chapter 305 also impact these processes for customers with demand of 100 kW or less.

As discussed earlier, many providers wish to offer the convenience of one-stop shopping by enrolling their customers for delivery service as well as generation service. However, there are reasons that customers should deal directly with the utility. First, customers should be informed of utility programs and protections. In addition, the utility also wants a direct relationship with its customers, and should not be denied that opportunity. Therefore, the proposed Rule has the effect of requiring that a customer contact the utility to initiate delivery service (which may include standard offer service) and the provider to initiate generation service. We invite comment on the benefits and risks of permitting a provider to act as an agent for its customers in regard to enrolling a customer for transmission and distribution service.

Section 7.A describes the operational steps that must occur to ensure that billing and load settlement reporting takes place properly. Section 7.A.1 provides that the provider notify the utility after the rescission period prescribed by Chapter 305. The EBT Working Group has determined that an enrollment period of two business days allows adequate time for the utility to process the enrollment.

Section 7.A.2.a provides that a change in a customer's generation service enrollment will occur on the customer's normal meter read date. Many persons believe that limiting enrollment to the meter read date is important to smooth operation of the market in the early years. They point out that off-cycle reads are costly and sometimes impossible to accomplish, that both off-cycle reads and prorating add administrative costs and may confuse customers, and that off-cycle enrollment increases the possibility of slamming. Prorating the bill is a less costly

alternative than an off-cycle read, but consumers often mistrust prorated bills.

Some providers advocate off-cycle enrollment because it allows them to obtain customers quickly. Other providers believe that off-cycle enrollment introduces a significant financial risk of purchasing supply that becomes stranded when a customer is recruited mid-cycle. Providers holding this second viewpoint may forbid their customers from cancelling generation service off-cycle through their terms of service or contract.

Consumers who are unhappy with a competitive electricity provider might be required to wait more than a month to switch to a new provider if off-cycle enrollment is not allowed. Even consumers who are in no hurry might be confused by the delay or might be unaccepting of a system that inhibits their inability to acquire a new provider in a timely manner. Although this concern is mitigated by the fact that Section 2.D of Chapter 301 of the Commission's rules allows a customer to convert to standard offer service on an off-cycle date, we are concerned that customers will desire the same ability when converting to any other new provider.

With these conflicting concerns in mind, we included a process for off-cycle enrollment, for discussion among commenters. The process allows two possibilities for calculating generation bills before and after enrollment - prorating and meter reading. We invite comment on both policy and implementation benefits and risks of allowing off-cycle enrollment. We invite comments that weigh the benefits and risks to customers, providers, and utilities.

Section 7.A.3 describes the action to be taken when a customer enrolls with more than one new competitive provider during one enrollment period. The Rule proposes that Maine follow the regional convention of choosing the first provider who notifies the utility of the customer's impending enrollment.

Section 7.B cross-references the rules that govern how a customer will be enrolled for standard offer service.

#### I. Section 8: Cancellation of Generation Service

A customer may cancel generation service by notifying its provider or by enrolling with a new provider. A provider may cancel a customer's service pursuant to provisions contained in Chapter 305. Section 8 describes the operational process that providers and utilities must follow to carry out a cancellation.

Section 8.A.1 cross-references Commission rules governing the process a provider must follow to cancel service to

its customers. It defines a process similar to the process a provider must follow to enroll a customer. The provider must notify the utility after a period prescribed by Chapter 305 has passed and before an enrollment period determined by the EBT Working Group to be long enough to guarantee that the operation can be completed successfully. The proposed Rule specifies that the utility will enroll the customer in standard offer service if the customer has not chosen a new provider through the normal enrollment process.

Consistent with enrollment provisions, Section 8.A.2 specifies that cancellation shall occur on the next scheduled cycle meter read date, but offers an alternative provision for off-cycle cancellation. Our comments regarding off-cycle enrollment apply to this provision as well, and we invite comment on the benefits and risks of off-cycle cancellation.

Section 8.B.1 clarifies that, when a customer begins utility service, the normal generation service enrollment provisions stated earlier in the proposed Rule will determine how the customer will be assigned generation service.

Section 8.B.2 states that a utility shall hold a customer's generation service enrollment unchanged for a 30-day period when a customer changes location within a service territory, if the customer so requests. This provision allows a customer to avoid re-enrollment with its present provider, a step that must be performed well in advance. It also protects the customer from inadvertently converting to the standard offer. We invite comment on the benefits and risks of allowing this 30-day holdover period.

The effect of Sections 7 and 8, when considered with the provisions of Chapter 305, is that customers and providers are contracting for a minimum of one month at the time a customer enrolls for generation service. We invite comment on whether customers will understand this time requirement.

#### J. Section 9: Transfer of Customer Data

Section 9.A specifies the data items that market participants must transfer to one another.

Section 9.A.1 identifies 12 prior months of kWh usage and monthly maximum demands as the data items that utilities must transfer to providers as a general practice. We understand that these are the data items routinely transferred in Massachusetts. Section 9.A.3 allows providers to request additional customer data from utilities, but allows utilities to charge for the data. Section 9.A.2 cross-references the EBT Standards, which will define data items that must be transferred among participants to operationalize the rules of doing business.

Many parties are concerned that requests by marketers for customer-specific and aggregate data from utilities will be so voluminous that they will be costly and difficult if not impossible to carry out. This concern appears valid to us. While providers must have access to data necessary to make reasonable sales decisions, utility rate payers must be protected against unreasonable or inefficient requests. The proposed Rule includes two alternatives to limit requests, for discussion by commenters. The first alternative limits requests to one per year for identical data. This provision has the disadvantage of requiring tracking. The second alternative allows data transfer only when the customer is enrolled. This provision solves the problem only when requests refer to a provider's existing customers. We invite recommendations for solutions to this problem.

Section 9.B assigns all variable costs of data transfer to the providers requesting the data. These costs may be significant. This approach is used in Massachusetts. It limits the number of requests, and can be argued to fairly allocate the costs of the transaction to the party that incurs it.

We invite comments on three questions. Is there a basic set of data items that utilities should provide to providers with no constraints? Who should bear the cost of developing and transferring data? Are there ways to ensure efficiency of data requests?

Section 9.C directs utilities and providers to comply with the standards contained in the EBT Working Group's report. The provision also directs providers to receive training and demonstrate transfer capability before selling electricity in Maine, but does not prohibit providers from soliciting customers before receiving training. The rule requires that an individual responsible for data transfer attend training to ensure that the provider is informed of all relevant operational issues. We invite comment on whether training should be required before a provider may be licensed, before a provider may solicit customers, or before a provider may sell electricity, and we invite comment on whether this provision will adequately protect the operational integrity of the transfer system.

Section 9.C assigns the responsibility and cost of training to the utilities. We invite comment on the equity of this provision.

Section 9.D governs data transfer before EBT operations are in effect. Market participants will require data during this period and current rules are not clear on boundaries for these requests. We invite comment on whether the proposed rule

adequately balances marketers' and customers' information needs with a utility's need to minimize its costs.

K. Section 10: Contract

Section K requires utilities and providers to enter into a contract that defines all terms governing their interaction. The Commission will initiate a proceeding to determine minimal contract requirements.

**V. PROCEDURES FOR THIS RULEMAKING**

This Rulemaking will be conducted according to the procedures set forth in 5 M.R.S.A. §§ 8051-8058. A public hearing on this matter will be held on January 7, 1999 at 9:00 a.m. at the Public Utilities Commission. Written comments on the proposed Rule may be filed with the Administrative Director until January 18, 1999. However, the Commission requests that comments be filed by December 31, 1998 to allow for follow-up inquiries during the hearing; supplemental comments may be filed after the hearing. Written comments should refer to the docket number of this proceeding, Docket No. 98-810, and sent to the Administrative Director, Public Utilities Commission, 242 State Street, 18 State House Station, Augusta, Maine 04333-0018.

Please notify the Public Utilities Commission if special accommodations are needed in order to make the hearing, if one is held, accessible to you by calling 1-287-1396 or TTY 1-800-437-1220. Requests for reasonable accommodations must be received 48 hours before the scheduled event.

In accordance with 5 M.R.S.A. § 8057-A(1), the fiscal impact of the proposed Rule is expected to be minimal. The Commission invites all interested parties to comment on the fiscal impact and all other implications of the proposed Rule.

The Administrative Director shall send copies of this Order and the attached Rule to:

1. All electric utilities in the State;
2. All persons who have filed with the Commission within the past year a written request for Notice of Rulemaking;
3. All persons on the Commission's electric restructuring service list, Docket No. 95-462;
4. All parties listed on the service list or who filed comments in the Inquiry, *Inquiry into Provisions for*

